

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JACKSON LEWIS LLP
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ATTORNEYS OF RECORD:
VICTORIA WOODIN CHAVEY, ESQ.
JEFFREY W. BRECHER, ESQ.

-----X
MONIQUE DA SILVA MOORE,
MARYELLEN O'DONOHUE, LAURIE
MAYERS, HEATHER PIERCE, and
KATHERINE WILKINSON, on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

PUBLICIS GROUPE SA and
MSLGROUP,

Defendants.
-----X

Case No. 11-cv-1279

**DECLARATION OF JEFFREY
W. BRECHER, ESQ.
IN OPPOSITION TO
PLAINTIFFS' RULE 72(A)
OBJECTION TO
MAGISTRATE JUDGE
PECK'S RULINGS**

I am an attorney admitted to practice law before the Courts of the State of New York, including the United States District Court for the Southern District of New York. I submit this Declaration in response to Plaintiffs' Rule 72(a) Objection To Magistrate Judge Peck's Rulings.

1. Attached hereto as Exhibit 1 is the Specific Objections and Responses to Interrogatory No. 3 of Defendant MSLGroup's First Set of Interrogatories served by Plaintiff da Silva Moore.

2. Attached hereto as Exhibit 2 is Plaintiff Monique da Silva Moore's Specific Objection and Response to Defendant MSLGroup's First Set of Requests for Production, pertaining to Requests No. 7 and 8.

3. Attached hereto as Exhibit 3 is MSLGroup's letter to Plaintiffs' counsel dated October 24, 2011, regarding Plaintiffs' discovery deficiencies.

4. Attached hereto as Exhibit 4 is a letter from Plaintiffs' counsel dated October 28, 2011, in response to MSLGroup's October 24, 2011 letter.

I declare under the penalties of perjury the foregoing is true and correct.

Dated: Melville, New York
January, 2012

s/

JEFFREY W. BRECHER

CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2012, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and/or the Southern District's Rules on Electronic Service upon the following parties and participants:

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s/
JEFFREY W. BRECHER